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Governor

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November 7, 2017

Commission's Secretary
Office of the Secretary
Federal Communications Commission

The Honorable Ajit Pai
Chairman
Federal Communications Commission
Washington DC

Re: WT Docket No. 17-79

Dear Commission Secretary and Chairman Pai:

We are responding to your request for comments regarding Federal Communications Commission's (FCC) Report and Order in which FCC proposes to consider replacement utility poles as being excluded from Section 106 review provided the following conditions are met: the poles are located within the same hole as the original pole, the height of the replacement pole does not exceed the height of the original pole by more than 10 percent, and the pole has an appearance consistent with the original pole.

The New Mexico State Historic Preservation Office (NM SHPO) has concerns regarding the potential for adverse effects to historic properties if the pole replacement occurs within an archaeological site. Removal of the pole, even if the replacement pole attempts to replace the pole in the original hole, has the potential to cause additional ground disturbance that may result in adverse effects to archaeological sites with visible artifacts and/or features on the surface as well as subsurface deposits. NM SHPO, therefore, recommends that FCC give further consideration on how to minimize the potential for adverse effects that exempting replacement poles may pose to historic properties. We previously stated this concern with our comments on June 7, 2017 regarding WT Docket No. 17-17 (comments on FCC Rulemaking).

We appreciate the opportunity to provide NM SHPO's comments regarding FCC's proposal to consider replacement utility poles as being excluded from Section 106 review, and we appreciate the FCC taking NM SHPO's comments into consideration as it makes its decision.

Sincerely,

Jeff Pappas, PhD.

New Mexico State Historic Preservation Officer